

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CESILIA VANEGAS , *et al.*

Plaintiffs,

vs.

Case No.: 15-cv-2298

DIAZ GRANADOS, INC., *et al.*

Defendants.

PLAINTIFFS' PETITION FOR ATTORNEYS' FEES AND COSTS

Plaintiffs herein petitions this Honorable Court for an award of their attorneys' fees and costs incurred in this action pursuant to this Court's Order dated January 24, 2017.

1. This action was filed on August 5, 2015.
2. Defendants have not answered or otherwise responded to the Complaint.
3. February 29, 2016, Plaintiffs filed their Request for Entry of Default and Motion for Default Judgment. A copy of the Request and Motion were mailed to Defendants on February 29, 2016, via U.S. Mail sent First Class with Postage Prepaid.
4. The Court entered Default Judgment for Plaintiffs and against Defendants on January 24, 2017.
5. In the Order entered on January 24, 2017, the Court requested that Counsel submit a Bill of Costs and Request for Attorneys' Fees within 14 days.
6. Plaintiffs' Bill of Costs is and attorneys' fees are attached hereto as Exhibit A. The total costs of this action are \$490.75. That total includes the filing fee of \$400 and \$90.75 to serve each of the Defendants.

7. Plaintiffs' attorneys' fees total \$3,870.00. A true and accurate accounting of these fees are attached to herein as Exhibit A.

8. Plaintiff's Counsel has been a member of the bar since June of 2007. Counsel customarily charges an hourly rate of \$300.00. Plaintiff provided a total of 12.9 hours of work in this matter to meet with clients, draft pleadings, speak with Defendants, draft and submit the Request for Entry of Default and Motion for Default Judgment, and drafting this fee petition.

9. A sworn statement of Plaintiffs' Counsel, Ken C. Gauvey, is attached hereto as Exhibit B.

WHEREFORE, Plaintiffs respectfully request the award of fees and costs in this matter in the amount of \$4,360.75.

Respectfully submitted,

/s/

Ken C. Gauvey (Bar No. 28464)
The Law Practice of Ken C. Gauvey, LLC
6700 Alexander Bell Drive
Suite 200
Columbia, MD 21046
(P) 410-346-2377
(F) 866-487-1154
kgauvey@gauveylaw.com

Attorney for Plaintiffs